

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE:

CHAPTER 11

SAMUEL E. SCOTT

CASE NO. 11-12156-JDW

**RESPONSE TO MOTION TO ENFORCE AUTOMATIC
STAY AND FOR OTHER RELIEF**

COMES NOW, Copiah County Tax Collector and Copiah County Chancery Clerk (collectively known as “Copiah County”), by and through their attorney, and files this their Response to the Motion to Enforce Automatic Stay and for Other Relief [Dkt. #490], and would show unto the Court as follows to-wit:

1. That Samuel E. Scott (“Scott”) filed for relief under Chapter 11 of the United States Bankruptcy Code on May 12, 2011. The creditor matrix [Dkt. #3] filed on behalf of Scott and the bankruptcy schedules [Dkt. #26] do not show an indebtedness owed on the ad valorem taxes.

2. At no time during the eleven (11) years that this case has been pending, has Copiah County been advised of this bankruptcy proceeding.

3. Copiah County would assert that it appears that all parties are wanting to move forward with a sale of property. The previous payment of the ad valorem taxes, by one of the owners of said property, does not impair, nor hinder that process.

4. Copiah County asserts, as the Debtor asserts, that it had no knowledge of the automatic stay being in place and requests that this Court deny this Motion to the extent that the Debtor’s estate is attempting to undo the tax sales as there is no showing how this would be beneficial to the bankruptcy estate.

5. Copiah County reserves the right to assert any other issues at a hearing on the matter.

WHEREFORE, PREMISES CONSIDERED, Copiah County Tax Collector and
Copiah County Chancery Clerk respectfully request that this Court enter an Order denying this
Motion, and for such other relief as is deemed just.

Respectfully submitted,

COPIAH COUNTY TAX COLLECTOR AND
COPIAH COUNTY CHANCERY CLERK

By:



EILEEN N. SHAFFER
Their Attorney

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CERTIFICATE OF SERVICE

I, Eileen N. Shaffer, attorney for Copiah County Tax Collector and Copiah County Chancery Clerk, do hereby certify that I have this date served via the Court's electronic noticing system a true and correct copy of the above and foregoing Response to Motion to Enforce Automatic Stay and Other Relief to the following on the day and year hereinafter set forth:

Derek A. Henderson, Esq.
Attorney for Lynda Butcher
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Robert Alan Byrd, Esq.
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United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

SO CERTIFIED, this the 18th day of July, 2022.



EILEEN N. SHAFFER